



*Consulting Engineers
and Scientists*

OCT 21 2011

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October 19, 2011
(PBW Project No. 1352)

VIA FEDERAL EXPRESS

Mr. Gary Miller
Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Ms. Barbara Nann
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 6
Superfund Division (6RC-S)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

**RE: UNILATERAL ADMINISTRATIVE ORDER FOR
REMEDIAL INVESTIGATION/ FEASIBILITY STUDY
GULFCO MARINE MAINTENANCE SUPERFUND SITE
FREEPORT, TEXAS**

Dear Mr. Miller and Ms. Nann:

This letter has been prepared pursuant to Paragraph 97 of the amended Unilateral Administrative Order, effective January 31, 2008 (the amended UAO), for the Gulfco Marine Maintenance Superfund Site (the Site) to demonstrate and certify that all Work and activities required under the amended UAO have been performed fully in accordance with the amended UAO. These activities were performed by Pastor, Behling & Wheeler, LLC (PBW) on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy), and The Dow Chemical Company (Dow) (collectively, the Respondents) as well as on behalf of Parker Drilling Offshore Corporation (Parker Drilling), who has participated in the Site work under an agreement it reached with the Respondents.

More specifically, all deliverables/meetings required in Appendix 1 of the Statement of Work (SOW) attached to the amended UAO have been performed with the following exceptions/clarifications:

- The Technical Memorandum on Modeling of Site Characteristics (Deliverable/Meeting 6 in Appendix 1) was not prepared as, per SOW Paragraph 36.b (i), the Respondents did not propose modeling as part of the Remedial Investigation/Feasibility Study (RI/FS);



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- The Potential Chemicals of Concern (PCOC) Memorandum and the Exposure Assessment Memorandum (Deliverables/Meetings 8 and 9, respectively, in Appendix 1) were not submitted as separate stand-alone documents, but were incorporated into the Baseline Human Health Risk Assessment (BHHRA) Report (Deliverable/Meeting 11 in Appendix 1).
- The Toxicological and Epidemiological Studies Memorandum (Deliverable/Meeting 10 in Appendix 1) was not prepared as, per SOW Paragraph 37.a (ix), no chemicals lacking an EPA toxicity value were identified as Site PCOCs.
- The Treatability Study Work Plan and the Treatability Study Report (Deliverables/Meetings 13 and 14, respectively, in Appendix 1) were not prepared as, per SOW Paragraph 38, no treatability testing was required by EPA.
- The Presentation to the EPA after submission of the Final RI Report (Deliverable/Meeting 16 in Appendix 1) was not performed, as pursuant to an April 27, 2011 e-mail from Mr. Miller, EPA indicated that such a presentation would not be necessary.

In accordance with Paragraph 97 of the amended UAO, I certify that the information contained in or accompanying this submission is true, accurate and complete. In accordance with Paragraph 52 of the amended UAO, I certify that I have been fully authorized by the above Respondents to submit this document and to legally bind these Respondents thereto.

Please let me know if you have any questions or comments.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

cc: Ms. Anne Foster – U.S. Environmental Protection Agency
Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Brian Buniva – Sequa Corporation
Mr. Donnie Belote – The Dow Chemical Company
Mr. Ed Menger – Parker Drilling Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. John Eldridge – Haynes and Boone, LLP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP
Mr. Jay Winters – Golder Associates, Inc.